

B. If your answer to "A" is YES, describe the action(s) in the space below. If there is more than one action, you must describe the additional action(s) on a separate piece of paper, using the same format as below.

1. Parties to previous civil action:

Plaintiff(s): N/A

Defendant(s): N/A

2. Court where filed: N/A

3. Docket or case number: N/A

4. Name of Judge: N/A

5. Basic claim made: N/A

6. Present disposition (Is the case still pending? Is it closed? If closed, was it appealed?):

N/A

III. GRIEVANCE PROCEDURES:

A. Is there a prisoner grievance procedure at the institution in which you are incarcerated?

YES [☒]

NO [☐]

B. Have you presented this grievance system the facts which are at issue in this complaint?

YES [☒]

NO [☐]

C. If your answer to "B" is YES, what steps did you take: INFORMAL RESOLUTION REQUEST, FORMAL GRIEVANCE AND GRIEVANCE APPEAL

D. If your answer to "B" is NO, explain why you have not used the grievance system:

IV. PARTIES TO THIS ACTION:

A. Plaintiff(s)

1. Name of Plaintiff: BARTON PRINCE
NORTHEAST CORRECTIONAL CENTER
2. Plaintiff's address: 13698 AIRPORT ROAD, BOWLING GREEN, MO 63334
3. Registration number: 1237764
4. Additional Plaintiff(s) and address(es): None.

B. Defendant(s)

1. Name of Defendant: DOCTOR BRADSHAW
E.R.D.C.C., 2727 Highway K, BONNE
2. Defendant's address: TERRE, MISSOURI 63628.
3. Defendant's employer and job title: CORIZON AND MISSOURI
DEPARTMENT OF CORRECTIONS AND IS A DENTIST.
4. Additional Defendant(s) and address(es): SEE NEXT ATTACHED PAGE
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ADDITIONAL DEFENDANT'S:

ROBERT JERRET
DENTIST
NORTHEAST CORRECTIONAL CENTER
13698 AIRPORT ROAD
BOWLING GREEN, MO 63334

Doctor Jerret is employed as a dentist with CORIZON and the Missouri Department of Corrections.

TAMMY ANDERSON
NORTHEAST CORRECTIONAL CENTER
13698 AIRPORT ROAD
BOWLING GREEN, MO 63334

Tammy Anderson is employed as the Medical Director of NECC and is employed with CORIZON and the Missouri Department of Corrections.

JANE DOE
EASTERN RECEPTION, DIAGNOSTIC & CORRECTIONAL CENTER (E.R.D.C.C.)
2727 HIGHWAY K.
BONNE TERRE, MO 63628

Jane Doe is a dental assistant at E.R.D.C.C. employed by CORIZON and the Missouri Department of Corrections whose name is presently unknown to plaintiff.

V. COUNSEL

A. Do you have an attorney to represent you in this action?

YES []

NO [XX]

B. If your answer to "A" is NO, have you made an effort to contact an attorney to represent you in this matter?

YES [X]

NO []

C. If your answer to "B" is YES, state the name(s) and address(es) of the attorneys you contacted and the results of those efforts:

John D. James, James Law Group, 14 Richmond Center Court

St. Peters, Missouri 63376. (636)-397-2411 After a review
of my case he cannot offer any help.

D. If your answer to "B" is NO, explain why you have not made such efforts:

N/A

E. Have you previously been represented by counsel in a civil action in this Court?

YES []

NO [X]

F. If your answer to "E" is YES, state the attorney's name and address:

N/A

- VI. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. State your claims in numbered paragraphs. You may use additional paper if necessary):

1. While a prisoner at the Eastern Reception &
Diagnostic Correctional Center on or about October or
November 2013, Plaintiff was having defendant Doctor
Bradshaw pull one of plaintiff's teeth per plaintiff's
request.

2. After the procedure plaintiff an elderly man in
his 70s discovered that Doctor Bradshaw had pulled all
of plaintiff's bottom teeth. Doctor Bradshaw was assisted
in the dental procedure by his assistant Jane Doe. When
Plaintiff told defendant Bradshaw and Doe he was only there
to have one tooth pulled assistant Doe checked Plaintiff's
I.D. and stated; "Doctor there are two Mr. Prince's here
today and we pulled all of the bottom teeth of the wrong
prisoner."

3. As stated, plaintiff is an elderly man and is in
his 70s and this caused plaintiff new and other related
health problems including but not limited to digestive
problems because he is unable to chew his food. It causes
plaintiff painful stomach aches, diarrhea and bloating.

SEE NEXT ATTACHED PAGES 5A-5B

Plaintiff also has sever pain in his mouth and gums from trying to chew food without teeth. Plaintiff has had bleeding in his mouth (gum area) on many occasions.

4. Plaintiff Barton Prince was then transferred to the Northeast Correctional Center in Bowling Green, Missouri and in 2014 he put in a medical service request to the dentist and explained to (dentist) Doctor Robert Jerret what had took place at ERDCC in Bonne Terre where Doctor Bradshaw had pulled all of plaintiff's bottom teeth when he was only suppose to pull one. Defendant Tammy Anderson and Defendant Doctor Robert Jerret determined that plaintiff would need a set of bottom dentures since the ones made at ERDCC in Bonne Terre were faulty.

5. Defendant Jerret and Anderson insisted plaintiff would have to give them his personal dentures so they could send the dentures out to be fitted to make new bottom dentures for the wrongfully pulled bottom teeth. Plaintiff told both defendant's Jerret and Anderson not to loose or let anything happen to his personal dentures because they personally costed plaintiff \$3,000.00. Defendant's Jerret and Anderson assured plaintiff nothing would happen to his \$3,000.00 personal teeth.

6. A month later it was discovered that the plaintiff's personal \$3,000.00 teeth had been stolen by defendant Jerret and Anderson for personal gain and profit.

7. Not having the dentures caused and continue to cause plaintiff problems digesting his food being unable to chew the food. It continues to cause plaintiff painful stomach aches, diarrhea and bloading. Plaintiff continues to have sever pain in his mouth and gums from

trying to chew his food without teeth or working dentures. Plaintiff continues to have bleeding in his mouth (gum area) on occasion.

CLAIMS FOR RELIEF:

8. The actions of defendant Doctor Bradshaw and defendant Jane Doe in pulling all of plaintiff's bottom teeth and its affect constituted cruel and unusual punishment and constitutes deliberate indifference to the plaintiff's serious medical needs both in violation of the Eighth Amendment to the United States Constitution.

9. The actions of defendant's Doctor Robert Jerret and defendant Tammy Anderson in stealing defendant's personal \$3,000.00 dentures and its affect on defendant's health constitutes cruel and unusual punishment and constitutes deliberate indifference to the plaintiff's serious medical needs both in violation of the Eighth Amendment to the United States constitution.

VII. RELIEF

State briefly and exactly what you want the Court to do for you. Do not make legal arguments. (Note: If you are a **state** prisoner and you seek from this Court relief that affects the length or duration of your imprisonment, your case **must** be filed on a § 2254 form.)

Order defendant Doctor Robert Jerret and defendant Tammy
Anderson to return the stolen \$3,000.00 dentures or replace them
with the same identical denture that they stole.

VIII. MONEY DAMAGES:

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES ☒ NO ☐

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

\$250,000.00 each in actual damages against defendant's Bradshaw and
Doe for the loss of plaintiff's teeth and compensatory of \$150,000.00
each for the physical and emotional injury resulting from their
failure to provide adequate medical care to plaintiff. And punitive
damages each in the amount of \$30,000.00. Please see next attached
page. Page 6-A

IX. Do you claim that the wrongs alleged in the complaint are continuing to occur at the present time?

YES [x] NO []

Barton Prince 1237764

Signature of attorney or pro se Plaintiff(s)
Barton Prince 1237764
Plaintiff, Pro-se

11-13-15
Date

DAMAGES CONTINUES:

\$3,000.00 each in actual damages against defendant's Robert Jerret and defendant Tammy Anderson for the \$3,000.00 dentures they stole and compensatory of \$30,000.00 each for the physical and emotional injury resulting from their failure to provide edequate medical care to plaintiff. And punitive damages each in the amount of \$10,000.00.